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July 16, 2025


The Court GRANTS the requested adjournments and extensions. The deadline for Defendant to answer or otherwise respond to the Complaint is extended to **September 5, 2025**. The initial pretrial conference is rescheduled to **September 30, 2025 at 2:30 p.m.**

VIA ECF

Hon. Jennifer L. Rochon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Date: July 17, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Re: *William Kostroun v. Heavy, Inc.*,
Case No. 1:25-cv-03003-JLR

Dear Judge Rochon:

We represent plaintiff William Kostroun ("*Plaintiff*") in the above captioned action. Pursuant to Paragraphs 1(F) of Your Honor's Individual Rules of Practice, Plaintiff and Defendant jointly respectfully request an adjournment of the July 22, 2025, Initial Pretrial Conference as well as the attendant deadlines in the Court's April 14, 2025 Notice of Initial Pretrial Conference until mid to late September 2025. By this letter the parties also request that Defendants time to respond to the complaint be extended by 30 days.

In support of this Motion, Plaintiff includes the following:

- (1) The Court has scheduled an Initial Pretrial Conference for July 22, 2025, at 3:00 p.m. (*Dkt. No. 7*);
- (2) This is Plaintiff's first request for an adjournment;
- (3) Good cause exists for the instant request as defendant Heavy, Inc.. ("*Defendant*") has yet to respond to Plaintiff's Complaint and, as of May 21, 2025, has extended their time to respond until July 21, 2025 (*Dkt. No. 10*).
- (4) Additionally, the Defendant jointly request a second extension of Defendant's time to respond to the complaint to September 5, 2025. The parties have made concrete progress in settlement discussions and would like to devote resources to an anticipated settlement.

The instant requests are made jointly and is made in good faith and granting the requested adjournment will not prejudice any party to this matter. Thank you for your consideration of this request.

Respectfully submitted,



/s/ Craig B. Sanders

Craig B. Sanders

Counsel for Plaintiff